

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MICHAEL KONOPKA and DRAGAN BOSOTINA, and
on behalf of themselves and all others similarly situated,
PLUMBERS LOCAL UNION NO. 1 OF THE UNITED
ASSOCIATION OF JOURNEYMEN AND
APPRENTICES OF THE PLUMBING AND FITTING
INDUSTRY OF THE UNITED STATES AND
CANADA, TRUSTEES OF THE PLUMBERS LOCAL
UNION NO. 1 WELFARE FUND, TRADE
EDUCATION FUND, and 401(k) SAVINGS PLAN,
TRUSTEES OF THE UNITED ASSOCIATION
NATIONAL PENSION FUND, and TRUSTEES OF THE
INTERNATIONAL TRAINING FUND,

Plaintiffs,

-against-

PACE PLUMBING CORP., PACE PLUMBING
DELAWARE CORP., THE PACE COMPANIES NEW
YORK LLC, PACE FIELD SERVICES, LLC d/b/a PACE
MECHANICAL, and EAGLESTONE, LLC d/b/a
EAGLESTONE NY, LLC, and ATERIAN
INVESTMENT MANAGEMENT, LP d/b/a ATERIAN
INVESTMENT PARTNERS,

Defendants.

25 CV 811 (RER) (CLP)

NOTICE OF MOTION

TO THE CLERK OF THE COURT and COUNSELORS:

PLEASE TAKE NOTICE, that upon the annexed declaration of Adrianna R. Grancio, Esq.,
dated July 1, 2025, and the exhibit annexed thereto; and the annexed Memorandum of Law, and
upon all pleadings and proceedings heretofore had herein, counsel for Plaintiffs Trustees of the
Plumbers Local Union No. 1 Welfare Fund, Trade Education Fund, and 401(k) Savings Plan,
Trustees of the United Association National Pension Fund, and the Trustees of the International

Training Fund, will move this Court before the Honorable Cheryl L. Pollak at the United States Courthouse, Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order granting Virginia & Ambinder, LLP's motion to withdraw as counsel of record for Plaintiffs' and for such other and further relief as the Court deems proper and just.

Dated: New York, New York
July 1, 2025

Respectfully submitted,

VIRGINIA & AMBINDER, LLP

By: /s/ Adrianna R. Grancio
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